

LETTER F: CALIFORNIA COASTAL COMMISSION.

STATE OF CALIFORNIA - THE RESOURCES AGENCY

CALIFORNIA COASTAL COMMISSION

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SAN FRANCISCO, CA 94105-2219
VOICE AND TDD (415) 904-5200

GRAY DAVIS, Governor



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CHANNEL ISLANDS NAT'L P.
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August 3, 2000

Tim J. Setnicka
Superintendent
Channel Islands National Park
1901 Spinnaker Drive
Ventura, CA 93001

Re: Draft Environmental Impact Statement for Anacapa Island Restoration Project

Dear Mr. Setnicka:

Thank you for the opportunity to comment on the above-referenced draft environmental impact statement. The proposed project includes the use of poison to eradicate black rats on Anacapa Island. The purpose of this letter is to inform the National Park Service that the proposed project is an activity that affects resources of the coastal zone and requires a consistency determination pursuant to the requirements of the federal Coastal Zone Management Act (CZMA).¹ Specifically, the National Park Service proposes to use aerial application of the rodenticide brodifacoum into all rat territories on Anacapa Island. The Commission staff agrees that these non-native rats degrade nesting habitat for shore and sea birds, compete with other native species, and the eradication of this animal would benefit the habitat values of the Island. However, the use of rodenticide could adversely affect water quality and habitat resources of the coastal zone. The rodenticides could degrade marine water quality through accidental discharges into the ocean or through storm runoff contaminated with the rodenticides draining into the ocean. Additionally, the rodenticide may also adversely affect non-target species either through the direct consumption of the poison or by consumption of animals killed by the poison. Therefore, the Commission staff believes that the proposed project triggers a requirement for a consistency determination pursuant to the CZMA² and its implementing regulations.³

A consistency determination is an evaluation of the proposed activity's effects on coastal resources or uses and its consistency with the mandatory enforceable policies of the California Coastal Management Program and includes the necessary information to support the federal agency's conclusion.⁴ A consistency determination must be submitted to the Commission 90 days prior to final federal approval of the

¹ 16 USC § 1450 *et seq.*

² 16 USC § 1456(c)(1).

³ 15 CFR § 930.34(a).

⁴ See 15 CFR § 930.39 for a full listing of the information required for a complete consistency determination.

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activity, unless the state and the federal agencies agree to an alternate schedule.⁵ If the federal agency determines that this activity does not affect coastal uses or resources, it must submit a negative determination 90 days before final federal approval of the activity.⁶

If you have any questions or need assistance preparing a consistency determination, please contact me at (415) 904-5292. Thank you for your cooperation in this matter.

Sincerely,

James R. Raives
Federal Consistency Coordinator

cc: South Central District

F1: On September 7, the Park sent a "Negative Determination" to the California Coastal Commission. In the letter the Park provided documentation as to why a "Negative Determination" was appropriate for this project.

⁵ 16 USC § 1456(c)(1) and 15 CFR §930.41(c).

⁶ 15 CFR § 930.35(d).